

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

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<b>In re:</b>	:	<b>Chapter 11</b>
	:	
<b>Timothy E. Cliggott</b>	:	<b>No. <u>15-12929</u></b>
	:	
<b>Debtor.</b>	:	
	:	
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**APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT OF  
CHUNG & PRESS, P.C. AS COUNSEL  
FOR THE DEBTOR AND DEBTOR-IN-POSSESSION**

**Timothy E. Cliggott**, debtor and debtor-in-possession (the "Debtor"), submits this application (the "Application") pursuant to section 327(a) of title 11 of the United States Code (the "Bankruptcy Code") and Federal Rule of Bankruptcy Procedure (the "Bankruptcy Rules") 2014(a) for an order authorizing the Debtor to employ and retain the firm of Chung & Press, P.C. ("Chung & Press") as his attorneys in this chapter 11 case. In support of this Application, the Debtor respectfully represents to this Honorable Court as follows:

1. On August 24, 2015, this case was commenced by the filing of a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Court").
2. The Debtor has continued and intends to continue in the possession of his property as debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

Daniel M. Press, VSB# 37123  
Chung & Press, P.C.  
6718 Whittier Ave., Suite 200  
McLean, VA 22101  
(703) 734-3800  
Counsel for Debtor

3. The Debtor is an individual resident of Prince William County, Virginia.

4. The Debtor desires to retain and employ Chung & Press pursuant to section 327(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) to perform all legal services in these proceedings as more fully set forth below.

5. In order to enable the Debtor to perform his duties as debtor-in-possession and to effect the proper and expeditious administration of this case, Chung & Press will be required to render legal services to the Debtor in connection with this proceeding, including, but not limited to, the following:

a) Assisting and advising the Debtor relative to the administration of this proceeding;

b) Representing the Debtor before the Bankruptcy Court and advising the Debtor on all pending litigations, hearings, motions, and of the decisions of the Bankruptcy Court;

c) Reviewing and analyzing all applications, orders, and motions filed with the Bankruptcy Court by third parties in this proceeding and advising the Debtor thereon;

d) Attending all meetings conducted pursuant to section 341(a) of the Bankruptcy Code and representing the Debtor at all examinations;

e) Communicating with creditors and all other parties in interest;

f) Assisting the Debtor in preparing all necessary applications, motions, orders, supporting positions taken by the Debtor, and preparing witnesses and reviewing documents in this regard;

- g) Conferring with all other professionals, including any accountants and consultants retained by the Debtor and by any other party in interest;
- h) Assisting the Debtor in negotiations with creditors or third parties concerning the terms of any proposed plan of reorganization;
- i) Preparing, drafting and prosecuting the plan of reorganization and disclosure statement; and
- j) Assisting the Debtor in performing such other services as may be in the interest of the Debtor and the Estate and performing all other legal services required by the Debtor.

6. The Debtor believes that Chung & Press is well-qualified to be counsel to the Debtor, having ample experience in bankruptcy and insolvency matters. Chung & Press's attorneys have had considerable experience in matters of this nature and are capable of rendering the services required.

7. As set forth in the Affidavit of Daniel M. Press, (the "Affidavit"), annexed hereto and made a part hereof, Chung & Press represents no interest adverse to the estate regarding the matters upon which it is to be engaged, and is "disinterested" as such term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b). Chung & Press will not, while retained by the Debtor, represent any other party in interest in connection with this case.

8. The members and associates of Chung & Press do not have any connection with the Debtor (other than as her attorneys), his affiliates, creditors, relatives, or any other party in interest, the United States trustee, or any person employed in the office of the United States trustee.

9. The employment of Chung & Press is in the best interests of the Debtor, his creditors and the estate.

10. Chung & Press will charge fees and expenses incurred in representing the Debtor in these proceedings based on the normal rates charged by the attorneys and paralegals of Chung & Press for similar clients, currently \$495/hr. for Daniel M. Press and Brett Weiss. Such rates are subject to periodic review and change, usually on an annual basis. Chung & Press will seek compensation for services rendered and expenses incurred upon appropriate application to the court pursuant to sections 330 and 331 of the Bankruptcy Code and Bankruptcy Rules.

11. Chung & Press, P.C., has received a payment of \$20,000 from the Debtor (of which \$5000 was applied to prepetition services), plus the filing fee, but has not received an advance for postpetition services.

WHEREFORE, the Debtor requests that he be authorized to retain and employ the law firm of Chung & Press, P.C. as counsel to assist in the performance of her functions as DIP and otherwise with respect to this case pursuant to section 327(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a); and for such other relief as the Court deems just and proper.

Dated: August 24, 2015.

Respectfully submitted,

/s/ Daniel M. Press

Daniel M. Press, VSB 37123  
Chung & Press, P.C.  
6718 Whittier Ave., Suite 200  
McLean, VA 22101  
(703) 734-3800  
(703) 734-0590 fax  
dpress@chung-press.com

**CERIFICATE OF SERVICE**

This is to certify that on this 24th day of August, 2015, I caused to be served on all creditors and parties in interest, as set forth on the attached matrix, by first class mail, postage prepaid (and by CM/ECF upon the United States Trustee and any parties receiving notice in such manner) the following documents:

Application to Employ of Chung & Press, P.C., as Counsel to the Debtor

/s/ Daniel M. Press  
Daniel M. Press, VSB 37123  
Chung & Press, P.C.  
6718 Whittier Ave., Suite 200  
McLean, VA 22101  
(703) 734-3800  
(703) 734-0590 fax  
dpress@chung-press.com

Label Matrix for local noticing  
0422-1  
Case 15-12929  
Eastern District of Virginia  
Alexandria  
Mon Aug 24 11:32:55 EDT 2015

United States Bankruptcy Court  
200 South Washington Street  
Alexandria, VA 22314-5405

American Medical Collection Agency  
4 Westchester Plz Ste 110  
Elmsford, NY 10523-1615

Best Buy  
PO Box 1802  
Dayton, OH 45401-1802

Bill LeMaster & Diane L. LeMaster  
12950 LeMaster Drive  
Nokesville, VA 20181-2457

(p)CAPITAL ONE  
PO BOX 30285  
SALT LAKE CITY UT 84130-0285

Carrington Mortgage Services, LLC  
599 W. Putnam Avenue  
Greenwich, CT 06830-6005

Chase Bankcard Svcs Inc  
PO Box 30755  
Tampa, FL 33630-3755

Chex System, Inc.  
Attn: Consumer Relations  
7805 Hudson Road, Suite 100  
Saint Paul, MN 55125-1595

ECMC  
1 Imation Place, Building 2  
Saint Paul, MN 55128-3422

Emerald AR Systems  
1850 N Central Ave, #1010  
Phoenix, AZ 85004-3948

Equifax  
P.O. Box 740241  
Atlanta, GA 30374-0241

Experian  
PO Box 9701  
Allen, TX 75013-9701

Fredericksburg Credit Bureau  
10506 Wakeman Dr  
Fredericksburg, VA 22407-8040

Georgetown Univ. Hosp.  
PO Box 32233  
Washington, DC 20007-0533

IC Systems Inc.  
PO Box 64886  
Saint Paul, MN 55164-0886

Internal Revenue Service  
Centralized Insolvency Operation  
Philadelphia, PA 19101-7346

JPMorgan Chase Bank  
501 Bleeker Street  
Utica, NY 13501-2401

Law office of Mitchell Kitroser  
631 US Highway 1 Suite 410  
North Palm Beach, FL 33408-4621

Mary Washington Hospital  
1001 Sam Perry Boulevard  
Fredericksburg, VA 22401-3354

Medical Data Systems, Inc.  
2001 9th Svenue, #312  
Vero Beach, FL 32960-6413

Medical Imaging of Fredericksburg  
1300 Hospital Drive, #100  
Fredericksburg, VA 22401-8451

Natalie Corneuille  
650 Potomac Avenue  
Alexandria, VA 22301-3064

Novant Health  
8700 Sudley Road  
Manassas, VA 20110-4418

Prince William County, Virginia  
1 County Complex Court  
Woodbridge, VA 22192-9202

Receivables Management Systems  
PO Box 8630  
Richmond, VA 23226-0630

Receivables Outsourcing, LLC  
1920 Greenspring Drive, #200  
Lutherville Timonium, MD 21093-4156

Robert Barlow  
3516 Plank Rd Ste 104  
Fredericksburg, VA 22407-6861

TransUnion Consumer Solutions  
PO Box 2000  
Crum Lynne, VA 19022

USAA Savings Bank  
PO Box 14050  
Las Vegas, NV 89114-4050

Judy A. Robbins  
Office of the U.S. Trustee - Region 4  
115 South Union Street, Room 210  
Alexandria, VA 22314-3361

Timothy E. Cliggott  
12849 LeMaster Drive  
Nokesville, VA 20181-2443

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One Bank  
PO Box 85015  
Richmond, VA 23285-5015

End of Label Matrix  
Mailable recipients 34  
Bypassed recipients 0  
Total 34